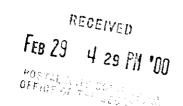
BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001



POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE OF RESPONSES OF WITNESS CAMPBELL TO INTERROGATORIES OF KEYSPAN (KE/USPS-T39-1(f), 4(a,c,d,e,g))

The United States Postal Service moves that it be permitted to file the responses of witness Campbell to KeySpan interrogatories KE/USPS-T39-1(f) and 4(a,c,d,e,g) one day late. These response were due to have been filed yesterday. The Postal Service was unable to complete necessary internal review of the responses in time for filing yesterday. As a consequence, the responses could not be filed until today. The Postal Service considers that no party will be prejudiced by the filing of these responses one day late.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.

Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2998 Fax –5402 February 29, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2998 Fax –5402 February 29, 2000